

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

In re

Vicky Rodríguez Torres
Debtor

Bankruptcy Case 09-10864 (BKT)

CHAPTER 7

Vicky Rodríguez Torres
Plaintiff

Adversary Proc. 10-00137 (BKT-7)

v.

18 U.S.C. §1030

18 U.S.C. §2510

18 U.S.C. §2701

**Enid López-López, Guillermo Camba-Casas,
Mariela Rexach Rexach, Government
Development Bank for P.R., et als.**
Defendants

42 U.S.C. §1983

42 U.S.C. §1985

42 U.S.C. 1988

TORTS

**MOTION FOR LEAVE TO FILE REPLY
AND REQUEST FOR EXTENSION OF TIME**

TO THE HONORABLE COURT:

COMES NOW, Co-Defendants, the Governmental Development Bank for Puerto Rico (hereinafter “GDB”) and Mariela Rexach-Rexach (hereinafter “Rexach”), through the undersigned counsels, and respectfully represent and pray:

1. On August 9, 2010, Plaintiff filed the instant adversary proceeding. See Dkt. 1.
2. On September 21, 2010, Co-Defendants filed a motion to dismiss alleging, essentially, (1) lack of subject matter jurisdiction, (2) failure to state claims upon which relief may be granted, and (3) collateral estoppel. See Dkt. 11.
3. On November 1, 2010, Debtor filed her Opposition to Motion to Dismiss. See Dkt. 48.
4. Pursuant to Local Rule 7(c), “[w]ith prior leave of court and within seven (7) days of the service of any objection to a motion, the moving party may file a reply memorandum, which

-2-

shall not exceed ten (10) pages in length and which shall be strictly confined to replying to new matters raised in the objection or opposing memorandum.”

5. The undersigned attorney is in the process of reviewing said opposition and determining which of the arguments contained in Plaintiff’s 52-page opposition merit a reply. In order to complete this task, prepare and file the reply, Co-Defendants respectfully request an extension of ten (10) days.

WHEREFORE, Co-Defendants respectfully request this Honorable Court to grant them leave to reply to Plaintiff’s opposition to the motion to dismiss and an extension of ten (10) days to file the same, with such further relief as this Court may deem proper and just.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 8th day of October 2010.

CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED that on this same date, the foregoing was filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to CM/ECF participants, and caused it to be served on the next business day via a third party court authorized noticing provider BK Attorney Services to: William Meléndez, Esq., 410 Park Avenue 15th Floor #1223, New York, NY 10022.

SCHUSTER AGUILÓ LLP
PO Box 363128
San Juan, Puerto Rico 00936-3128
Tel: (787) 765-4646; Fax: (787) 765-4611

s/ Andrés C. Gorbea Del Valle
Andrés C. Gorbea Del Valle
USDC PR No. 226313
agorbea@salawpr.com